

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

PROXENSE, LLC

Plaintiff,

vs.

TARGET CORPORATION

Defendant.

Case No. 6:20-cv-879-ADA

**JURY TRIAL DEMANDED**

---

**DEFENDANT’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO ANSWER FIRST AMENDED COMPLAINT**

Defendant Target Corporation files this unopposed motion for extension of time to answer or otherwise respond to Proxense, LLC’s First Amended Complaint (Dkt. #15). The current deadline for Defendant to respond to the First Amended Complaint is December 28, 2020. Defendant needs additional time to prepare its response and thus seeks an extension of three weeks on its current deadline to respond, such that its new deadline will be January 18, 2021. Plaintiff has confirmed that it is not opposed to the extension of time sought in this motion.

Dated: December 18, 2020

Respectfully submitted,

/s/ Gilbert A. Greene

Gilbert A. Greene

**DUANE MORRIS LLP**

Las Cimas IV

900 S. Capital of Texas Highway, Suite 300

Austin, TX 78746

Tel.: 512-277-2246

Fax: 512-597-0703

Email: [BGreene@duanemorris.com](mailto:BGreene@duanemorris.com)

Matthew S. Yungwirth (admitted *pro hac vice*)

**DUANE MORRIS LLP**

1075 Peachtree Street NE, Suite 2000

Atlanta, GA 30309-3929

Telephone: 404-253-6900

Email: [msyungwirth@duanemorris.com](mailto:msyungwirth@duanemorris.com)

Christopher J. Tyson (admitted *pro hac vice*)

**DUANE MORRIS LLP**

505 9th Street N.W., Suite 1000

Washington, DC 20004-2166

Tel: 202.776.5213

Email: [cjtyson@duanemorris.com](mailto:cjtyson@duanemorris.com)

*Attorney for Defendant Target Corporation*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served upon all counsel of record via ECF and electronic mail on this the 18<sup>th</sup> day of December, 2020.

/s/ Gilbert A. Greene

Gilbert A. Greene